REMEDIAL ACTION REPORT WILLOW BROOK AND WILLOW BROOK POND UNITED TECHNOLOGIES CORPORATION PRATT & WHITNEY EAST HARTFORD, CT

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Prepared for

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Prepared by

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EXECUTIVE SUMMARY

WILLOW BROOK AND WILLOW BROOK POND REMEDIAL ACTION REPORT UNITED TECHNOLOGIES CORPORATION

United Technologies Corporation (UTC)/Pratt & Whitney Division retained Loureiro Engineering Associates, Inc. (LEA), to design and perform the remediation of polychlorinated biphenyl (PCB) contaminated soil and sediment within and immediately surrounding Willow Brook and Willow Brook Pond at the UTC/Pratt & Whitney manufacturing facility in East Hartford, Connecticut. The project was undertaken to satisfy the requirements of Consent Order SRD-130. The following report has been prepared in accordance with the requirements of paragraph B.1.e of Consent Order SRD-130 and presents data supporting the attainment of the remedial action objectives for the project. The remediation activities were initiated on July 2, 2001 and were completed on August 31, 2002.

In addition to satisfying the requirements of SRD-130, the project was also implemented as a final remedy under the Resource Conservation and Recovery Act (RCRA) Corrective Action and Toxic Substance Control Act (TSCA) programs. On January 19, 2001, the EPA RCRA Corrective Action Program issued a determination that the remediation of contaminated sediments within Willow Brook and Willow Brook Pond was necessary. In order to obtain a decision that the remediation would be considered a final remedy for this area, EPA RCRA Corrective Action and TSCA staff were involved in the review of the RAWP and were included in all project related correspondence with the various regulatory agencies.

The overall remedial action objective was to physically remove from the site, via excavation and off-site disposal, all soil and sediment containing total PCB concentrations in excess of 25 mg/kg and then install a geotextile, soil and rock cap (engineered control) over the entirety of Willow Brook Pond and the open channel of Willow Brook from Willow Brook Pond to Main Street. Three areas within the Site were assigned additional remedial objectives. For the wetland and the southern portion of the Lower Willow Brook Pond, the additional remedial action objective was to physically remove all soil and sediment exhibiting contaminants at concentrations greater than the Residential Direct Exposure Criteria (RDEC) for PCBs. For the footprint of the Process Water Facility, inclusive of the small embayment west of the Process Water Facility, the additional remedial action objective was to meet the RDEC for PCBs for soils within 4-feet of the final grade, the Industrial/Commercial Direct Exposure Criteria (IDEC) for PCBs for soils located in inaccessible locations and the GB Pollutant Mobility Criteria (GB PMC) for soils above the seasonal high water table. All remedial action objectives were met during the course of the project.

The remediation included the demolition and removal of the Process Water Facility, a substation (Substation 54), and a former oil/water separator that was located between Upper and Lower Willow Brook Pond.

The remedial action objectives also included the implementation of two institutional controls to ensure the long-term protectiveness of the remedy. The institutional controls consist of 1) an Environmental Land Use Restriction (ELUR) to ensure the affected area will not be used for residential purposes and to prohibit excavation and 2) a fence around the entire project area to preclude access to Willow Brook and Willow Brook Pond. At the time of this report, the

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perimeter fence is in place and a draft ELUR has been submitted to the Commissioner of DEP for approval.

Initially, it was anticipated that the total volume of soil and sediment to be excavated and disposed of off the Site would be approximately 12,500 cubic yards, which was estimated to be roughly equivalent to 21,250 tons (estimated at 1.7 tons per cubic yard). It was also estimated that the excavation and off-site disposal activities would be completed in the winter of 2001, with final restoration and establishment of vegetation to be performed through spring of 2002. Upon completion of the remediation activities, 66,706 tons (60,513,936 kilograms), or approximately 55,500 cubic yards of contaminated soil and sediment were excavated and disposed of off the site. The additional volume of contaminated soil resulted from (1) greater than anticipated lateral and vertical extent of contamination in planned remediation areas and (2) a decision by UTC/Pratt & Whitney Division to complete excavation beyond the limits required in Consent Order SRD-130 in select areas of the site where, due to physical constraints, the performance of future remediation would not be cost-effective or prudent.

Following the completion of excavation and demolition activities, the entire site was restored. The site restoration involved the installation of three types of engineered controls over the remaining soil and sediments. The engineered controls were designed to accommodate the anticipated stream flow velocities and considered the ultimate use of the areas. The Wetland north of Willow Brook was remediated to meet the RDEC. As such, there is no need for an engineered control within this area. The restoration activities performed were focused on restoring this area to a marsh with habitat value.

The permits and approvals issued by the Army Corps of Engineers, the DEP Inland Water Resources Division, and the DEP Permitting, Enforcement & Remediation Division contain specific requirements for various activities that extend beyond the construction period. The mandatory post-remediation activities for this project include monitoring and maintenance of the engineered controls, monitoring and maintenance of the wetland restoration, groundwater monitoring, and recording of the necessary land use restrictions and demonstrating financial assurance for the engineered control maintenance and monitoring activities. These post-construction activities are underway. Completed activities include the first round of post-remediation groundwater monitoring, the first post-remediation engineered control inspection, the first post-construction wetland mitigation monitoring event, the demonstration of financial assurance, and the drafting of an ELUR for the approval of the Commissioner of the DEP.



















